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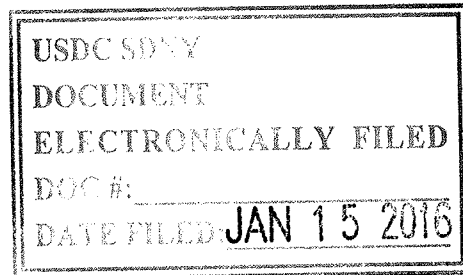
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January 14, 2016

**VIA ECF**

Hon. Alison J. Nathan, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007



Re: *Lopez et al. v. Advantage Plumbing & Mechanical Corp. et al.*,  
Index No.: 1:15-cv-4507(AJN)

Dear Judge Nathan,

The parties in the above referenced matter jointly submit this letter in response to paragraph 14 of your Honor's October 23, 2015 Case Management Plan and Scheduling Order requesting a Joint Pre-Trial Report 40 days prior to the close of discovery which is currently scheduled for February 23, 2015. *See* Dkt. No. 20. On November 23, 2015, Plaintiffs filed a letter motion for leave to file an amended complaint which, *inter alia* seeks to add additional Plaintiffs and claims for discrimination and violations of Plaintiffs' civil rights to what was originally a wage and hour case. *See* Dkt. Nos. 21-22, 24. The Court gave Defendants an opportunity to oppose this motion which Defendants did on December 7, 2015 and to which Plaintiffs filed their reply on December 10, 2015. *See* Dkt. Nos. 26-27. This motion is now fully briefed and pending before the Court.

As no decision has been issued regarding Plaintiffs' proposed amended complaint, the parties believe a report addressing pre-trial issues is premature at this stage as the status of the operative pleading is uncertain. Additionally, the parties believe that a 60-day extension of the current February 23, 2016 close of discovery to April 23, 2016 would be beneficial to allow the Court an opportunity issue an opinion on Plaintiffs' proposed amended complaint and allow the parties to conduct appropriate discovery based on the controlling complaint (to date no depositions have been conducted). The Court has scheduled the next case management conference for March 18, 2016 (after the close of the current due date for fact discovery) but the parties are happy to speak with the Court telephonically or appear in person if necessary, at the Court's convenience, to discuss the aforementioned issues.


Respectfully submitted,

/s/  
Brett Gallaway, Esq.

Cc via ECF: Elizabeth Schalet, Esq.  
Ralph Hochberg, Esq.

The deadline for the joint pretrial report and other pretrial submissions is adjourned sine die, as is the case management conference scheduled for March 28, 2016. These will be rescheduled when the Court issues an order regarding the proposed amended complaint. The discovery period is extended through April 23, 2016.  
SO ORDERED

**SO ORDERED:**

  
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HON. ALISON J. NATHAN  
UNITED STATES DISTRICT JUDGE

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